

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

ALTERRA AMERICA INSURANCE CO., et al.,

Plaintiffs,

- against -

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

Index No. 652813/2012 E

Hon. Andrea Masley

Mot. Seq. 022

DISCOVER PROPERTY & CASUALTY
COMPANY, et al.,

Plaintiffs,

- against -

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

Index No. 652933/2012 E

Hon. Andrea Masley

Mot. Seq. 023

**AFFIRMATION OF
DUSTIN CHO**

DUSTIN CHO, pursuant to CPLR 2106, affirms as follows under the penalties of perjury:

1. I am an attorney associated with Covington & Burling LLP, counsel for Defendants National Football League and NFL Properties LLC. I am a member in good standing of the bar of the State of New York. I submit this affirmation in support of the National Football League and NFL Properties LLC's Memorandum of Law in Support of Non-Party Teams' Motion for a Protective Order Regarding Insurers' Subpoenas of Non-Party Teams, dated May 24, 2019. This affirmation is based on personal knowledge and my review of the attached document.

2. Attached as **Exhibit A** is a true and correct copy of the Motion to Dismiss or Stay Based on *Forum Non Conveniens* and the Memorandum of Points and Authorities, both dated September 13, 2012, filed by TIG Insurance Company, North River Insurance Company, and U.S. Fire Insurance Company in *National Football League and NFL Properties, LLC v. Fireman's Fund Insurance Company, TIG Insurance Company, et al.*, Case No. BC490342, in Superior Court of the State of California, County of Los Angeles. The California court granted the motion on November 28, 2012.

Dated: Washington, D.C.
May 24, 2019



Dustin Cho